

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

det
4/3/15
10AM
MAR 31 2015UNITED STATES OF AMERICA
v.Eduardo Ramirez-Ramirez
Laredo, TexasOlga Martinez
4920 Paz Lane
Laredo, Texas

CRIMINAL COMPLAINT

David J. Bradley, Clerk
Laredo Division

Case Number: 5:15mj375-1

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of 10AM

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about March 30, 2015 in Laredo, Texas Webb County, in the Southern District of Texas, Eduardo Ramirez-Ramirez and Olga Martinez defendant(s),

a Mexican citizen and a United States citizen, did unlawfully transport Mexican nationals Eduardo Mondragon-Ruiz, Oscar Jimenez-Ruiz, and six (6) other undocumented aliens by means of a motor vehicle within the Southern District of Texas knowing or in reckless disregard of the fact that said aliens had come to, entered, or remained in the United States in violation of law, and transported or moved said aliens within the United States by means of motor vehicle or otherwise, in furtherance of such violation of law.

in violation of Title 8 United States Code, Section(s) 1324
Special Agent,

I further state that I am a(n) Homeland Security Investigations and that this complaint is based on the
 Official Title

following facts: based on statements of the accused and records of the Immigration & Naturalization Service.

Continued on the attached sheet and made a part of this complaint: Yes No



Signature of Complainant

Fernando Bonilla

Printed Name of Complainant

Sworn to before me and signed in my presence,

March 31, 2015

Date

J. Scott Hacker
U.S. Magistrate Judge
 Name and Title of Judicial Officer

at Laredo, Texas

City and State


 Signature of Judicial Officer

United States of America

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vs

Eduardo Ramirez-Ramirez
Olga Martinez

[CONT OF BASIS OF COMPLAINT]

On March 29, 2015, Homeland Security Investigations (HSI), Laredo, Texas, Special Agents (SAs) received information from a concerned citizen that a smuggling attempt was to occur at the Motel 6 located at 5920 San Bernardo in Laredo, Texas. The concerned citizen advised SAs that two load vehicles were to drop off eight to ten undocumented aliens (UDAs) to room 120. SAs set up surveillance on the location and observed the following.

On March 29, 2015, at approximately 10:00 p.m., HSI SA observed the driver of a grey in color Dodge Ram bearing Texas license plate FGY 5953 arrive to the Motel 6 and enter room 120. Records checks revealed the registered owner to be Olga Margarita. The subject exited the room and left the immediate area. At approximately 11:45 p.m. HSI SAs observed a silver in color Honda Civic bearing Texas license plate 87B6527 arrive to the motel parking lot. Following the silver Honda Civic was a red in color Honda Civic bearing Texas license plate FJC7263. Four subjects were observed exiting the red Honda Civic and enter room 120. The silver Honda Civic stayed in the area and exited in tandem with the red Honda Civic.

At approximately 12:45 a.m., the red Honda Civic returned to the area and four additional subjects were seen exiting the vehicle and entering room 120. HSI SAs followed the Honda Civic and Laredo Police Department conducted a traffic stop and detained the driver, identified as Eduardo RAMIREZ-Ramirez. HSI SAs maintained surveillance on room 120 and observed the silver Honda Civic return to area and the passenger drop off food for the UDAs. The Laredo Police Department conducted a traffic stop on the silver Honda Civic and identified the occupants as Olga MARTINEZ, Esmeralda GARZA-Martinez, and Esmeralda's two juvenile children.

HSI SAs along with Laredo North Border Patrol Agents (BPAs) approached room 120. HSI SAs were granted consent to search the room and discovered eight UDAs. All subjects freely admitted to being illegally present in the United States. RAMIREZ-Ramirez; MARTINEZ; GARZA-Martinez and her juvenile children were transported to 109 Shiloh to be interviewed. All UDAs were transported to Laredo Processing Center to be processed accordingly.

RAMIREZ-Ramirez was advised of his Miranda Rights which he acknowledged and waived. RAMIREZ-Ramirez admitted to being hired by Olga MARTINEZ to transport the UDAs to the Motel 6. RAMIREZ-Ramirez stated that MARTINEZ was to pay him \$50 USD per UDA he transported.

Olga MARTINEZ was advised of her rights which she acknowledged and waived. MARTINEZ admitted that she was to coordinate the transportation of the UDAs and in exchange was to receive \$250 to \$300 USD per UDA.

All UDAs were interviewed and all had made arrangements to be smuggled into the United States and on to their respective desired interior cities. The smuggling fee for each UDA was \$6,500 USD to which all had already paid \$1,700 USD of that fee.

RAMIREZ-Ramirez and MARTINEZ were subsequently arrested and charged with 8 USC 1324. Eduardo MONDRAGON-Ruiz and Oscar JIMENEZ-Ruiz were held as material witnesses in this case. Esmeralda GARZA-Martinez was interviewed and released.